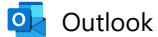


EXHIBIT H



Re: Subpoena For Perez Hilton

From Perez Hilton <ph@perezhilton.com>

Date Sat 7/19/2025 4:26 PM

To Esra Hudson <EHudson@manatt.com>

Cc mgottlieb@willkie.com <mgottlieb@willkie.com>; Stephanie Roeser <SRoeser@manatt.com>; anathan@willkie.com <anathan@willkie.com>; Matthew Bruno <MBruno@manatt.com>; Meryl Governski <mgovernski@dirllp.com>; laura.prather@haynesboone.com <laura.prather@haynesboone.com>; michael.lambert@haynesboone.com <michael.lambert@haynesboone.com>; kbender@willkie.com <kbender@willkie.com>; LimanNYSDChambers@nysd.uscourts.gov <LimanNYSDChambers@nysd.uscourts.gov>; Hilton Perez <ph@perezhilton.com>

1 attachment (717 KB)

2025.07.19 Subpoena to Mario Lavandeira Jr..pdf;

Accepted.

Since I am representing myself it may take me some time to read and fully digest what is being asked. But, of course, I will respond to you within the required 14 days.

Additionally, my account to be able to file a motion in Judge Liman's court is pending.

So I am informing all the parties here (and Ccing the judge's office) of the below:

NOTICE OF MOTION AND MOTION TO SEAL OR REDACT PERSONAL INFORMATION

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Mario Armando Lavandeira, Jr., also known publicly as Perez Hilton, hereby respectfully moves this Court for an order to seal or redact any personal identifying information, including but not limited to my residential address - as well as my email and phone number, from the public docket and any filed affidavits, declarations, or documents associated with attempted service of a subpoena and any related proceedings in this matter.

This motion is made on the following grounds:

1. I am a public figure with a long-standing and well-documented online presence and media platform.
2. The disclosure of my residential address poses a real and immediate threat to my personal safety and the safety of my family.
3. A review of this Court's public docket shows that Plaintiff's counsel on July 18, 2025, submitted identifying information for a third party - Cynthia Barnes Slater - who had not been successfully served. That individual is not a public figure, and their private information was nonetheless included in a court filing, exposing her to potentially grave harassment - or worse.
4. As someone with international name recognition and a significant online following, I am at increased risk of being targeted by individuals who may misuse or exploit this information and this poses a real and immediate threat to my safety and that of my children and mother, who also live in my residence.

5. I have communicated directly with Plaintiff's counsel and offered to accept service via email, thereby eliminating the need for public disclosure of my home address.
6. My home address, email and phone number are not publicly available information nor as a non-party to this litigation are my sensitive details relevant to this complaint or of interest to the public.

This request is narrowly tailored to protect my privacy and ensure physical safety without interfering with the Plaintiff's ability to pursue legitimate litigation goals. I respectfully ask the Court to exercise its discretion and grant this Motion to Seal or Redact Personal Information in any current or future filings.

Seeing as Ms. Lively has publicly spoken on numerous occasions about her role as a mother, I thank her and you all in advance for your cooperation with this matter - as a justifiably concerned parent for the safety of my young children.

Respectfully submitted,

Mario Armando Lavandeira, Jr

Pro Se

Dated: July 19, 2025

DECLARATION OF MARIO ARMANDO LAVANDEIRA, JR. IN SUPPORT OF MOTION TO SEAL OR REDACT PERSONAL INFORMATION

I, Mario Armando Lavandeira, Jr., declare and state as follows:

1. I am representing myself in this matter and am competent to make this declaration.
2. I am a public figure widely known by the professional name Perez Hilton, and I have maintained an extensive digital presence for over two decades.
3. Due to the nature of my work and my public status, I have historically been the target of online harassment, threats, and unwanted attention.
4. I am a father of three young children, and the safety of my family is my highest priority.
5. I was recently made aware that Plaintiff's counsel, in this case, filed a document that publicly disclosed the identifying information of another individual who had not yet been successfully served. Docket entry 440.
6. I am deeply concerned that my residential address - as well as phone number and email address - could be disclosed in a similar manner, particularly since the case in question is being monitored globally and is the subject of daily social media commentary and content creation.
7. In good faith, I contacted Plaintiff's counsel directly and offered to accept service of the subpoena via email, thereby negating any need for further physical attempts or disclosures.
8. I am simply asking the Court to protect my personal information in this matter — a modest and justified request that seeks to preserve my safety and privacy and that of my minor children and senior mother.

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Executed on: July 19, 2025

At: Las Vegas, NV

Mario Armando Lavandeira, Jr.

On Jul 19, 2025, at 8:10AM, Hudson, Esra <EHudson@manatt.com> wrote:

Dear Mr. Hilton,

Thank you for your email confirming that you will accept service. Attached please find the subpoena, which is addressed to you in your legal name. The date of compliance is based on today's service date. Please confirm your acceptance of service via this email.

Best regards,
Esra Hudson

Esra Hudson
Partner and Leader, Employment & Labor

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From: Perez Hilton <ph@perezhilton.com>
Sent: Friday, July 18, 2025 4:36 PM
To: Hilton Perez <ph@perezhilton.com>
Cc: mgottlieb@willkie.com; Roeser, Stephanie <SRoeser@manatt.com>; anathan@willkie.com; Bruno, Matthew <MBruno@manatt.com>; mgovernski@dirllp.com; laura.prather@haynesboone.com; michael.lambert@haynesboone.com; kbender@willkie.com; LimanNYSDChambers@nysd.uscourts.gov; Hudson, Esra <EHudson@manatt.com>
Subject: Re: Subpoena For Perez Hilton

[EXTERNAL] Please do not reply, click links, or open attachments unless you recognize the source of this message and know the content is safe.

Just noticed there was a typo on Esra Hudson's email. It bounced back.

Resending this with her correct address.

Perez

On Jul 18, 2025, at 1:32 PM, Perez Hilton <ph@perezhilton.com> wrote:

Hello counsel.

Perez Hilton here.

I am working under the assumption that you are trying to serve me a subpoena from Blake Lively.

As of today, July 18th, 2025, I still have not been served.

I am writing to inform you that I have no lawyers working with me on this issue and I will be handling it myself - well within my legal rights.

If you would like to serve me a subpoena, you can reply back to this email with it attached and I will acknowledge I have been served.

Perez